

STEVEN M. BAKER
Nevada Bar No. 4522
BERTOLDO BAKER CARTER & SMITH
7408 W. Sahara Avenue
Las Vegas, Nevada 89117
Telephone : (702) 228-2600
Facsimile : (702) 228-2333
E-mail : joanee@NVLegalJustice.com
Attorneys for Plaintiff
KELLY L. TENNYSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KELLY L. TENNYSON,

Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, a foreign business
entity; DOES I through XX, inclusive; and
ROE CORPORATIONS I through XX,
inclusive,

Defendants.

CASE NO.: 2:18-cv-2260-APG-EJY

**STIPULATION AND ORDER TO STAY
CURRENT DISCOVERY DEADLINES
PENDING THE OUTCOME OF PRIVATE
MEDIATION**

Pursuant to Local Rules 6-1 and 26-4, the parties, by and through their respective counsel of record, hereby stipulate and respectfully request that this Court stay current discovery deadlines in the above captioned matter for the reasons stated below.

Statement Specifying the Discovery Completed

In connection with the Rule 26(f) Conference, the parties have served their respective initial disclosures of documents and witnesses. Plaintiff has propounded discovery on Defendant, and received the responses to same on March 11, 2019. Defendant has propounded discovery on Plaintiff, and responses were served on April 29, 2019. Plaintiff propounded a Second Set of Interrogatories on Defendant, and those responses were served on April 15, 2019. Defendant served

1 Amended Answer to Plaintiff's Second Set of Interrogatories on August 9, 2019. The parties have
2 agreed to the Mediation of this matter, and it will take place on November 4, 2019 before the
3 Honorable Jackie Glass.

4 **Discovery That Remains to be Completed**

5 The parties anticipate that the depositions of multiple out-of-state adjusters and managers
6 will be conducted. It is also anticipated that the depositions of all liability and medical experts will
7 be conducted thereafter, as well as the depositions of material fact witnesses. In order to
8 accommodate the Mediation, and avoid potentially unnecessary time and expense, the parties have
9 agreed to schedule and conduct these depositions until after the Mediation. Further, Plaintiff is still
10 treating for her injuries allegedly related to the underlying claim. The parties are also working on
11 dates to schedule Plaintiff's deposition.

12
13 **Reasons Why Remaining Discovery Was Not Completed, and Otherwise the Good Cause for**
14 **the Requested Extension:**

15 As stated above, the parties have agreed to mediate this matter on November 4, 2019 before
16 Judge Glass.

17 This case involves allegations of breach of contract and bad faith related to Plaintiff's claims
18 for benefits under her insurance contract with State Farm, and the manner in which it handled those
19 claims. As such, the parties have identified and discussed the depositions of multiple adjusters
20 and/or claims managers. Those individuals are located in the States of Georgia and Washington.
21 The parties desire to avoid the time and expense associated with such depositions pending the
22 anticipated Mediation.

23
24 Therefore, the instant Stipulation is submitted by the parties. The parties hereby request that
25 discovery be stayed, and all disclosure and the discovery deadlines be extended. Should the
26 Mediation of November 4, 2019 not result in a resolution of the case, the parties will submit a
27 Proposed Scheduling Order within fifteen (15) days of November 4, 2019.
28

1 This stipulated request is submitted for the reasons explained above, in good faith, and not
2 for purposes of undue delay, or for any reason other than a mutual desire to allow for a Mediation
3 of this matter. Should Mediation not resolve this matter, the parties will submit a Joint Status Report
4 and new Proposed Discovery Plan and Schedule Order within fifteen (15) days of November 4,
5 2019.
6

7 DATED: September 23, 2019

DATED: September 23, 2019

8 **BERTOLDO BAKER CARTER & SMITH**

LEWIS BRISBOIS BISGARRD & SMITH

9 By: 

10 STEVEN M. BAKER (NSB #4522)

7408 W. Sahara Avenue

Las Vegas, Nevada 89117

Telephone : (702) 228-2600

Facsimile : (702) 228-2333

E-mail :

joanee@NVLegalJustice.com

Attorneys for Plaintiff

KELLY L. TENNYSON

By: /s/ Pamela McGaha

PAMELA L. MCGAHA (NSB #8181)

CHERYL A. GRAMES (NSB #12752)

6385 S. Rainbow Blvd., Ste. 600

Las Vegas, NV 89118

Telephone: 702-893-3383

Facsimile: 702-893-3789

Attorneys for Defendant

STATE FARM MUTUAL AUTOMOBILE

INSURANCE COMPANY

Tennyson v. State Farm
CASE NO.: 2:18-cv-2260-APG-EJY

STIPULATION AND ORDER TO STAY CURRENT DISCOVERY DEADLINES
PENDING THE OUTCOME OF PRIVATE MEDIATION


ORDER

IT IS SO ORDERED.

DATED this 24th day of September, 2019.


**UNITED STATES DISTRICT
COURT MAGISTRATE JUDGE**

Respectfully submitted by:


STEVEN M. BAKER, ESQ. (NSB #4522)
BERTOLDO BAKER CARTER & SMITH
7408 W. Sahara Avenue
Las Vegas, Nevada 89117
Attorneys for Plaintiff
KELLY L. TENNYSON

BERTOLDO BAKER CARTER & SMITH
7408 West Sahara Avenue
Las Vegas, Nevada 89117
702-228-2600 • Fax 702-228-2333